



BLACKBURN GOULD  
& ASSOCIATES

# **EQUALITY AND DIVERSITY PROCEDURE**



## **EQUALITY AND DIVERSITY POLICY AND PROCEDURE**

### **EXECUTIVE STATEMENT**

Blackburn Gould is made up of a wide range of people with diverse backgrounds and circumstances, which we value and regard as a great asset. We are aware that some groups may unfortunately experience treatment from time to time that has a negative effect on their quality of life. Specific legislation is in place to protect the rights of individuals and groups to ensure that discrimination is prevented and that they are given equal access to employment, education and other services.

The law seeks to prevent discrimination based on nine “Protected Characteristics”, which are:

- Age
- Disability
- Race
- Gender re-assignment
- Marital and Civil Partner status
- Pregnancy and Maternity
- Religion and Belief
- Sex
- Sexual Orientation

All employees, students, partners, visitors, contractors and sub-contractors working on our behalf must not unlawfully discriminate against or harass other people including current and former staff, job and student applicants, students, suppliers, partners, contractors and sub-contractors, and visitors.

This applies in the workplace, outside the workplace (when dealing with students, suppliers or other work-related contacts), and on work-related trips or events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

- Direct discrimination
- Indirect discrimination
- Harassment
- Victimisation
- Disability discrimination



## **Equality & Diversity Policy Statement**

- Blackburn Gould is committed to tackling inequality and discrimination, advancing equality of opportunity and promoting equal treatment regardless of any Protected Characteristic.
- We will seek to ensure that this commitment is reflected in everything that we do and that all employees, learners, partners, visitors, contractors and sub-contractors working on our behalf share this commitment.
- Blackburn Gould will ensure awareness and compliance of this commitment through a variety of both formal and informal means, details of which are contained within this Policy.
- This policy does not form part of any employee's contract of employment and Blackburn Gould may amend it at any time without further notice.

### **The Executive Board**

#### Responsibility

The Executive Board has overall responsibility for ensuring that the Organisation complies with the discrimination law. All Directors are responsible for the effective operation of this policy and for the advancement of Equality and Diversity (“E&D”).

This includes:

- the monitoring and review of this policy;
- the supervision of operational procedures; and
- ensuring recruitment and selection procedures are in line with this policy.

#### Training

Training will be provided to all Directors on matters relating to E&D.

Further training will be provided where required or requested.

#### Reporting Structures

The Executive Board receives an annual report on E&D activity including recommendations for an E&D Action Plan and Equality Scheme.

The Executive Board should ensure that E&D issues and policies are implemented and monitored appropriately.

### **Learners**

#### Responsibility

Learners are responsible for their behaviour and conduct and must abide by all the organisations acceptable conduct guidelines and E&D Policy.



### Learner Induction

All learners undertake an induction led by the assessor for their course. The induction makes clear to learners that discrimination, harassment; bullying and victimisation will not be tolerated on or off campus or online.

Learner Induction and supporting material may be delivered via an online video induction. E&D is included in both the Induction and the subsequent Tutorial Curriculum and materials are made available throughout the year.

### Challenging Discrimination, Harassment, Bullying and Victimisation

Where an incident involving discrimination, harassment, bullying or victimisation occurs in the classroom, the assessor should refer learners to the relevant guidelines on conduct. Learners and Staff should report such incidents to the Head of Centre in the first instance. Where incident happens outside the organisation's offices or online, Blackburn Gould will investigate such incidents and will report the incident to external agencies (such as the police) where appropriate.

### **Assessors/ Staff**

#### Responsibility

Assessors are responsible for their behaviour and conduct and for the advancement of E&D both in their classrooms/work areas, online forums and on premises used by Blackburn Gould.

#### Staff Induction

All staff are entitled to receive, and must attend, a Staff Induction.

In addition, all new staff must complete the mandatory on-line E&D training package and pass the on-line test.

#### Staff Development

All staff can apply to attend/undertake additional E&D training, some of which maybe mandatory.

### Challenging Discrimination, Harassment, Bullying and Victimisation

Staff should report all incidents involving students or staff where discrimination, harassment, bullying or victimisation has occurred relating to the protected characteristics of others, be it on or off premises used by Blackburn Gould. The Head of Centre will capture date related to this and produce reports on this information.

Where an incident involving discrimination, harassment, bullying or victimisation relating to a protected characteristic occurs and this involves a member of staff, attempts should be made to resolve the matter informally with the individuals involved where this is appropriate.



If informal steps are not appropriate or the matter cannot be resolved in this way, the matter should be reported to the Executive Director. This may lead to a Grievance being raised in such circumstances. As a general principle, the decision whether to progress a complaint is up to the individual complaining of discrimination. However, Blackburn Gould has a duty to protect all staff and may pursue the matter independently if, in all the circumstances, it is appropriate to do so. In either case, the matter will be investigated, and one result of such investigation may be disciplinary action.

Blackburn Gould takes a strict approach to breaches of this policy by staff, which may be dealt with in accordance with Staff Disciplinary Process. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

There must be no victimisation or retaliation against staff who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under the Staff Disciplinary Process.

## **External Partners**

### Responsibility

External partners with which Blackburn Gould work must comply with our E&D Policy and share our commitment to E&D, as set on in its E&D Policy Statement.

When drawing up agreement or contracts with external partners, we will ensure that external partners are made aware of this requirement, and Blackburn Gould will assure itself that the external partner has appropriate policies and procedures in place regarding E&D.

## **Visitors, Contractors and Sub-contractors**

### Responsibility

Visitors, contractors and sub-contractors must comply with our E&D Policy.

All staff meeting/employing visitors, contractors and sub-contractors are responsible for making them aware of Blackburn Gould's E&D Policy.

## **Data Collection and Monitoring**

The personal data of learners and staff are collected, stored and used in line with Blackburn Gould's Data Protection Policy. The whole organisation is responsible for monitoring the data available for each of the Protected Characteristics, where they are identified and taking appropriate action to advance E&D and to reduce any gaps in achievement.

The Executive Director monitors enrolment, retention, achievement and success data at appropriate points throughout the academic year.



This data is evaluated in SARs (Self-Assessment Reports) and where there are achievement gaps for different Protected Characteristic groups, the team will identify actions to eliminate or reduce these gaps. These actions become part of the Quality Improvement Plan (QIP) for the organisation and, as such, will be monitored regularly.

Blackburn Gould will use the data available and put in place systems to monitor data for different groups of people. Key data include those relating to staff (applications, interviews, employment, turnover and staff satisfaction) and students (enquiries, applications, interviews, admissions, complaints, appeals, and disciplinaries, breaches of assessment, additional learning support and student satisfaction).

Blackburn Gould will monitor this data in the SARs and where there are differences in the data for different groups of people; identify actions to eliminate these differences. These actions are inserted into QIPs and monitored regularly. The Executive Board will monitor E&D data relating to students and staff.

### **Curriculum Development**

Key issues including E&D are included as part of the review of curriculum programmes and EDIMs (Equality & Diversity Impact Measures) data is used to inform and improve the curriculum offer and its delivery.

### **Equality Impact Assessments**

In accordance with the public sector equality duty, due consideration is given to the potential impact of quality-of-service delivery/learning experience on groups of staff and learners whenever there is a change or review of a policy or procedure and every effort is made to avoid adverse or discriminatory outcomes for any staff, learners or partners.

### **Equality and Diversity Scheme and Action Plan**

Blackburn Gould and Associates is committed to a programme of action to make this Policy fully effective. To support the implementation of this Policy we will produce an Equality Scheme and an Action Plan to bring into mainstream focus some of the key functions of the policy by the end of 2021.

The strategy focuses on five key themes for mainstreaming:

- Leadership
- Communication
- Compliance
- Engagement



- Recruitment, admission, retention and quality learning impacts and achievements of under-represented groups

Blackburn Gould will:

- Seek to ensure that people are treated fairly and equally regardless of their belonging to any of the Protected Characteristic groups.
- Promote diversity in its students and staff by recognising the particular contributions that can be made by individuals from a wide range of backgrounds and experiences.
- Promote and maintain an inclusive and supportive study and work environment, which affirms the rights of individuals to be treated fairly and with respect, and which affords opportunities for all to fulfil their potential.
- Promote a recruitment and admissions process which seeks to ensure equality of opportunity and access for all.

### **Policy Objectives**

By adopting this policy, Blackburn Gould will seek to ensure that discrimination does not take place and that everyone associated with the organisation is treated fairly and equally. We have therefore made the commitment to create an inclusive environment where discrimination is challenged and equality is positively promoted.

This policy is designed to make more effective use of all the human resources available for the continuing development of the organisation. It should support better delivery of training by ensuring that:

- Equality of opportunity is embedded in all policies, practices, decision making and evaluation processes.
- Blackburn Gould seeks to promote a positive and welcoming environment and provides equality of opportunity and freedom from discrimination on the grounds of any of the Protected Characteristics.

Blackburn Gould seeks to create a visibly diverse environment which values difference and enables all to realise their potential.

- We will act against any forms of discrimination, harassment and bullying including the publication and display of offensive or degrading literature that might be directed at any member of staff, learner, or visitor.
- We value learner and staff feedback to remain alert to patterns of inequality and related concerns, which are not identified through statistical monitoring tools.

We will ensure that our stance on equal opportunity is well published in the local community and particularly to all who wish to work or study or do business with Blackburn Gould.